

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

QUICK FITTING, INC.	:	
Plaintiff	:	
	:	
v.	:	CA No. CA 11-463-L
	:	
ZHEJIANG XINGXIN AITE	:	
COPPER MFG. CO. LTD., and	:	
QIFU XIE a/k/a "FRANK" XIE	:	
Defendants	:	

**ASSENTED-TO MOTION FOR AN EXTENSION OF DISCOVERY
AND OTHER PRE-TRIAL ORDER DEADLINES**

The plaintiff, Quick Fitting, Inc. ("Quick Fitting"), hereby moves, with the assent of the defendants and pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, for an extension of the current discovery deadline and all other pre-trial deadlines in this matter for a period of 150 days.

As grounds for this extension, Quick Fitting represents that it recently acquired information, and was only able to confirm such information *immediately prior to this filing*, that defendant Qifu Xie was no longer associated with defendant Zhejiang Xingxin Aite Copper Mfg. Co. Ltd. ("XXAT"), but had associated with a new company, Yorhe Fluid Intelligent Control Co., Ltd. ("Yorhe").

By letter dated October 20, 2012, a true and accurate copy of which is attached hereto as Exhibit A, counsel for Quick Fitting made inquiry to counsel for XXAT and Xie concerning a possible change of ownership of XXAT. There were subsequent communications between counsel, but it was not until November 21, 2012 that counsel for the defendants (Mr. Cornell) was able to ascertain information concerning the present relationship between XXAT, Mr. Xie, and Yorhe. Mr. Cornell promptly reported that

information to plaintiff's counsel. Given the time constraints, the new situation that has arisen, and the need for more time on both sides to develop further information and legal analysis connected to the allegations in this lawsuit, the parties each desire to extend all current deadlines. No party believes that any other party is requesting this extension for unfair advantage or that such extension will be prejudicial.

Wherefore, plaintiff Quick Fitting seeks an order extending and resetting the deadlines listed in the existing Pretrial Order as follows:

Close of factual discovery:	April 25, 2013
Close of expert discovery:	June 27, 2013
Plaintiff's expert disclosures:	April 25, 2013
Defendant's expert disclosures:	May 27, 2013
Filing of pretrial memoranda:	July 25, 2013

Each new deadline requested follows the original deadline by a period of approximately 150 days, depending on the particular month and last day of the extension period.

The undersigned counsel for Quick Fitting states and represents that counsel for the defendants assents to this Motion.

Date: November 23, 2012

QUICK FITTING, INC.

By Its Attorneys,

/s/ Thomas R. Noel
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Granted;
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